

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ROBERT FLEMING, *on behalf of* :
himself and all others similarly situated, :

Plaintiff, :

-v- :

PORTFOLIO RECOVERY :
ASSOCIATES, L.L.C., TRACY H. :
REESE and TAMARA D. STARKS, :

Defendants. :

: CIVIL ACTION

: FILE NO. 1:13-cv-02974-RLV-ECS

NOTICE OF DEPOSITION OF NYETTA C. JACKSON

TO: Portfolio Recovery Associates, LLC
C/O Through Its Counsel of Record
Alan D. Leeth, Esq.
John O'Shea Sullivan
Burr & Forman, LLP
171 Seventeenth Street, NW
Suite 1100
Atlanta, GA 30363

PLEASE TAKE NOTICE that on the 15th day of July, 2014, beginning at 8:30
A.M. at the office of Tayloe Associates, 253 West Bute Street, Norfolk, VA 23510
(Phone No. (757) 461-1984) Plaintiff will take the deposition of Nyetta C. Jackson
pursuant to F.R.Civ.P. 30 before a certified court reporter which will be recorded by

stenographic means. Deponent is requested to bring to the Deposition those documents listed on Exhibit A. The oral examination will continue from day to day until completed or concluded in accordance with the Court rules of the U.S. District Court for the Northern District of Georgia. Said deponent will be examined for the purposes of discovery and any and all purposes allowed by law. You are invited to attend the deposition.

This 8th day of July, 2014.

Respectfully submitted,

S/Dwight Bowen

Dwight Bowen

Georgia Bar Number 071150

Attorney for Plaintiff

235 Peachtree Street, N.E., Suite 400

Atlanta, Georgia 30303

(404) 880-3310

(404) 880-3332 (fax)

EXHIBIT A

1. Any and all documents reviewed by you in preparing the Declaration of Nyetta C. Jackson filed herein.
2. Any and all documents pertaining to or evidencing any communication you had with any person or entity other than legal counsel in preparing the Declaration of Nyetta C. Jackson filed herein.
3. The Sale File transferred to Portfolio Recovery Associates (“PRA”) with respect to the Plaintiff’s account.
4. All “account level” documents pertaining to Mr. Fleming’s Account provided to PRA at the time the Account was acquired by PRA.
5. All “account level” documents pertaining to Mr. Fleming’s Account provided to PRA subsequent to the point in time that the Account was acquired by PRA.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ROBERT FLEMING, <i>on behalf of</i>	:
<i>himself and all others similarly situated,</i>	:
	:
Plaintiff,	:
	: CIVIL ACTION
-v-	:
	: FILE NO. 1:13-cv-02974-CC-ECS
PORTFOLIO RECOVERY	:
ASSOCIATES, L.L.C., TRACY H.	:
REESE and TAMARA D. STARKS,	:
	:
Defendants.	:
_____	:

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed this Notice of Deposition Nyetta C. Jackson the CM/ECF system which will automatically send e-mail notification of each filing to the following attorneys of record:

Amanda Elizabeth Wilson
awilson@burr.com

Robert Franklin Springfield
fspringf@burr.com

Alan D. Leeth
aleeth@burr.com

John O'Shea Sullivan
ssullivan@burr.com

This 8th day of July, 2014.

S/Dwight Bowen
Dwight Bowen